

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

JOHN DOE subscriber assigned
IP address 108.52.236.56,

Defendant.

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) Civil Case No. 2:21-cv-05178-GJP
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) Judge John R. Padova
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**DEFENDANT’S DECLARATION IN SUPPORT OF MOTION TO MAINTAIN
PSEUDONYM IDENTIFIER IN CASE CAPTION
AND PERMANENTLY SEAL DOCUMENTS**

[REDACTED], of full age, declares as follows:

1. I am the individual currently identified as John Doe subscriber assigned IP address 108.52.236.56 (“Defendant”) and submit this Declaration based upon my personal knowledge, in support of the Motion To Maintain Pseudonym Identifier In Case Caption and Permanently Seal Documents (“Motion”).

2. The Motion seeks to permanently seal the following documents (collectively, the “Materials”):

- a. First Amended Complaint and Civil Cover Sheet. D.E. 8.
- b. Defendant’s Declaration In Support Of Motion To Maintain Pseudonym Identifier In Case Caption and Permanently Seal Documents. (This Document).

3. The Materials contain my true name, address, and the BitTorrent activity and social media evidence that has been alleged by Plaintiff to identify me as the infringer of its copyrighted works.

4. The basis for sealing the Materials is that my current employer, prospective future employers, and members of my community would learn of the allegations in this case, *i.e.*, the alleged copyright infringement of adult content. I have been made aware that internet searches typically do not show cases within the Court's CM/ECF system. However, many journalists and bloggers routinely conduct research and write articles on BitTorrent copyright infringement matters, effectively making information about these cases widely available to the general public.

5. I will suffer a clearly defined and serious injury if the Materials are not sealed. Specifically, I may be terminated from my current employment and/or lose future employment opportunities based on the allegations of this case, resulting in financial losses. Further, my reputation would be tarnished irreparably if I am publicly associated with the allegation in this case, *i.e.*, the alleged copyright infringement of adult content.

6. There is no illegitimate motive behind the request to allow me to defend this matter under a pseudonym.

7. I am not a public figure.

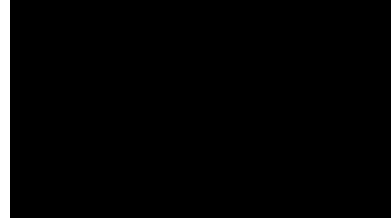
8. This motion seeks to seal only those documents that identify myself by name, address, and the BitTorrent activity and social media evidence that has been alleged by Plaintiff to identify me as the infringer of its copyrighted works. There is no less restrictive means to protect this information other than to seal the relevant portions documents containing this information on the public docket. The public interest in having access to the basic contours of the dispute giving rise to this filing is still served by the public filing of the Materials in redacted form.

9. The parties consent to this sealing request. To the best of my knowledge, no nonparty objects to this sealing request.

10. I certify under penalty of perjury that the foregoing is true and correct.

Dated: March 29, 2022

By:

A large black rectangular redaction box covers the signature area. A horizontal line extends from the right side of the box.